

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BLACK LIVES MATTER SEATTLE-  
KING COUNTY, ABIE EKENEZAR,  
SHARON SAKAMOTO, MURACO  
KYASHNA-TOCHA, ALEXANDER  
WOLDEAB, NATHALIE GRAHAM,  
AND ALEXANDRA CHEN,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

No. 2:20-cv-00887-RAJ

DECLARATION OF CLOIE CHAPMAN IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
CONTEMPT

I, Cloie Chapman, declare and state as follows:

1. The information contained in this declaration is true and correct to the best of my knowledge, and I am of majority age and competent to testify about the matters set forth herein.

2. I am a Seattle resident residing in the International District. I have participated in protests against police violence. As a mixed-race Asian American, I feel that it is important to add my voice as an ally to individuals and communities that bear more of the brunt of police violence.

3. On July 25, 2020, I joined the protest at Seattle Central College sometime between noon and 1pm. I marched with others, going south on Broadway and then onto Boren

1 Avenue, then turning left onto 12th Avenue. During all this time, the march was non-violent and  
2 I heard no sirens and I did not see police officers until we got to 12th and Pine when we came  
3 upon a huge crowd of bike cops.

4 4. With no warning, the cops began throwing flash bangs and pepper balls at us.  
5 Though I had a mask on, the smoke from the pepper balls made me cough and my skin burned. I  
6 saw a person get hit in the back of the knee with a projectile, and another person, hit in the back.

7 5. It was around 4pm by now, and the police kept pushing the line, using pepper  
8 balls and there was a lot of white gas or smoke. At previous protests, I had heard warnings, a  
9 notice to move, and dispersal orders. At no time on July 25, 2020, did I hear a warning or  
10 dispersal order.

11 6. I then heard calls for a medic. Though I don't consider myself to be a medic,  
12 because I'm trained in administering first aid and am CPR certified, I ran toward the calls. I  
13 came upon Joey Wieser in an alley where people had taken him to get him away from the police.  
14 I could see him visibly shaking. His face was red and he couldn't open his eyes. Fortunately,  
15 others came with supplies and flushed his face and eyes with various solutions until, it seemed  
16 like 20 minutes later, he was finally able to open his eyes.

17 7. I then returned to rejoin other protesters. At one point, I was near the intersection  
18 of Broadway and Pine. The group I was with was sandwiched between two lines of police. I did  
19 not see what weapons the police were using. All I know is that there was lots of gas, lots of  
20 smoke. It felt like my skin was burning. I inhaled gas and it caused burning in my lungs. I could  
21 feel my chest tighten. I began coughing.

22 8. The group I was with was engaging in non-violent protest. We posed no threat to  
23 anyone. Things were calm before the police began using flash bangs, pepper balls, and other  
24 devices.  
25  
26

I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct.

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